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October 21, 2014

Miriam Ingenito, Acting Director
California Department of Toxic Substances Control
1001 I Street
Sacramento, CA 95814

SUBJECT: Comment Letter – September 2014 Safer Consumer Products DRAFT
Priority Product Three Year Work Plan

The Orange County Sanitation District (OCSD) is pleased to submit comments on the California Department of Toxic Substances Control (DTSC) September 2014 *Safer Consumer Products DRAFT Priority Product Three Year Work Plan* (Draft Work Plan). Overall, OCSD believes that DTSC is undertaking appropriate and reasonable efforts to address the use of chemicals that impact our shared environment, including facilities like OCSD.

OCSD owns two wastewater treatment plants that serve 2.5 million people in northern and central Orange County. OCSD provides high quality effluent for recycling water, which is crucial during the ongoing drought. OCSD appreciates the fact that DTSC is considering impacts to facilities, such as OCSD, when identifying product categories and chemical candidates to address. Contrary to the historical fallacy that waste flushed down the sewer "magically disappears," at least in people's mind and conscious, wastewater treatment plants have the task of treating or removing such waste, although it is far cheaper and easier to mitigate such pollutants at their originating sources. OCSD noted that the product categories selected for the first three-year work plan were based on a prioritization scheme that included consideration of chemicals that "have aquatic resource impacts and/or which have been observed through water quality monitoring." OCSD is grateful for such consideration, because the Draft Work Plan will help OCSD be able to carry out its mission and serve its residents more effectively and efficiently.

To help carry out its mission of recycling water, OCSD had a similar effort underway until the Safer Consumer Products regulation was adopted. OCSD had identified existing and emerging priority pollutants for its facilities, and OCSD had developed a grouping system for addressing multiple priority pollutants from the commercial and light industrial sectors. The groupings were based on functional uses (i.e., how a product is used), and OCSD's functional uses correlates well with DTSC's Product Categories. Interestingly, OCSD's functional uses that addressed the most priority pollutants overlap quite well with DTSC's initial draft Product Categories. A comparison table is provided below:

DTSC's Draft Product Categories	OCSD's Functional Uses
Beauty, Personal Care, and Hygiene Products	Coloring Agents and Dyes, Coatings
Building Products and Household, Office Furniture and Furnishings	Coatings
Cleaning Products	Cleaners, Degreasers, and Additives
Clothing	Coloring Agents and Dyes, Coatings
Fishing and Angling Equipment	N/A
Office Machinery (Consumable Products)	Coloring Agents and Dyes

We protect public health and the environment by providing
effective wastewater collection, treatment, and recycling.





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While OCSD understands that DTSC has not yet reached the point of identifying specific Priority Products or Candidate Chemicals, OCSD would like to offer for DTSC's consideration, the following list of chemicals and chemical classes that are of concern to OCSD:

- 1,4-dioxane
- 1,3-dioxolane
- boron
- MITC (methyl isothiocyanate)
- molybdenum
- nitrosamines (e.g., *N*-nitrosodimethylamine (NDMA) and *N*-nitrosodi-n-propylamine (NDPA))
- pyrethroids
- selenium
- perchlorate
- PFOS and PFOA (perfluorinated compounds)
- polybrominated diphenyl ethers (PBDE)
- *tert*-butyl alcohol
- triclosan

OCSD was pleased to note that some of these were already mentioned in the Draft Work Plan as Potential Candidate Chemicals under the proposed Product Categories. OCSD respectfully requests that when DTSC has finalized its Draft Work Plan and begins to identify Chemical Candidates for each Product Category that it keeps in mind these chemicals and chemical classes as well.

In summary, OCSD believes that DTSC has a sound framework in place and is addressing Product Categories and Chemical Candidates in an orderly manner. Thank you for the opportunity to provide comments on the Draft Work Plan. OCSD looks forward to continuing to work with and support DTSC in its efforts. If there are any questions, please contact me or Mark Kawamoto at (714) 593-7450 or (714) 593-7424, respectively.

James E. Colston
Environmental Compliance Manager

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